



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

December 10, 2019

VIA ECF

Hon. Valerie E. Caproni  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

USDC SDNY  
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Re: *Shujaat v. Barr, et al.*, No. 19 Civ. 10411 (VEC)

**MEMO ENDORSED**

Dear Judge Caproni:

This Office represents the government in this action in which plaintiff seeks a declaration that U.S. Citizenship and Immigration Service's ("USCIS") denial of her Application to Register Permanent Residence or Adjust Status (Form I-485) violates the Administrative Procedure Act ("APA") and that she is eligible to adjust status to a lawful permanent resident pursuant to 8 U.S.C. §§1254a and 1255(a). On behalf of the government, I write respectfully to request that the initial conference presently scheduled for December 20, 2019 be adjourned to a date at least one week after January 20, 2020.

By way of background, this Office was served with a copy of the complaint on November 21, 2019, and thus the government's response to the complaint is due January 20, 2020. *See* Fed. R. Civ. P. 12(a)(2). The adjournment is respectfully requested to provide the government with time to investigate the facts and circumstances of the case and to formulate its position in this litigation as afforded by the Federal Rules of Civil Procedure. In light of the request to adjourn the initial conference, the government also requests that the December 12, 2019 deadline to submit the accompanying joint letter also be extended accordingly. This is the government's first request to adjourn the initial conference and to extend the deadline to submit the joint letter. Plaintiff's counsel consents to these requests.

I thank the Court for its consideration of this letter.

The initial conference is adjourned to **January 31, 2020, at 10:00 A.M.** The parties' pre-conference submissions are due no later than **January 23, 2020.**

SO ORDERED. Date: 12/10/2019

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

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cc: Counsel of record (via ECF)